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Attorneys for Defendant  
PATRICK M. BYRNE

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ROBERT HUNTER BIDEN,  
  
Plaintiff,  
  
v.  
  
PATRICK M. BYRNE,  
  
Defendants.

Case No. 2:23-cv-9430-SVW-PD

**STIPULATION TO EXTEND TIME  
TO RESPOND TO INITIAL  
COMPLAINT BY NOT MORE THAN  
30 DAYS (L.R. 8-3)**

**Complaint Served by Waiver of Service:**  
November 16, 2023  
**Current Response Date:**  
January 16, 2024  
**New Response Date:**  
February 6, 2024

CYPRESS LLP  
1925 Century Park East, Suite 1700  
Los Angeles, California 90067  
(424) 901-0123

1 Plaintiff Robert Hunter Biden (“Plaintiff”) and Defendant Patrick M. Byrne  
 2 (“Defendant,” and collectively with Plaintiff, the “Parties”), through their respective  
 3 attorneys of record herein and without waiving any rights, claims, or defenses they  
 4 have in this action, enter into this stipulation pursuant to Civil Local Rule 8-3, with  
 5 reference to the following circumstances:

6 WHEREAS, Plaintiff filed his complaint on November 8, 2023.

7 WHEREAS, Defendant’s attorney executed a Waiver of Service on November  
 8 16, 2023, which Plaintiff filed on November 21, 2023 [Dkt. No. 12].

9 WHEREAS, Defendant’s answer is due 60 days later, on January 16, 2024.

10 WHEREAS, Cypress LLP was recently retained to represent Defendant in this  
 11 action.

12 WHEREAS, Local Rule 8-3 provides in pertinent part that “A stipulation  
 13 extending the time to respond to the initial complaint shall be filed with the Clerk. If  
 14 the stipulation, together with any prior stipulations, does not extend the time for  
 15 more than a cumulative total of thirty (30) days from the date the response initially  
 16 would have been due, the stipulation need not be approved by the judge.”

17 WHEREAS, Plaintiff and Defendant met and conferred and agreed to extend  
 18 the deadline on which Defendant must file and serve a responsive pleading in this  
 19 action for twenty-one days, from January 16, 2024, to February 6, 2024.

20 WHEREAS, this extension does not extend Defendant’s deadline to respond  
 21 to the complaint to a date more than thirty days from the date the response initially  
 22 would have been due.

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NOW, THEREFORE, THE PARTIES HEREBY STIPULATE:

1. Pursuant to Civil Local Rule 8-3, Defendant's deadline to file and serve a response to Plaintiff's complaint shall be February 6, 2024.

**CYPRESS LLP**

DATED: January 16, 2024

By: /s/ Nabil L. Abu-Assal

Nabil L. Abu-Assal

Douglas P. Roy

Daniel A. Corren

Attorneys for Defendant Patrick M. Byrne

**WINSTON AND STSRAWN LLP**

DATED: January 16, 2024

By: /s/ Paul Benedict Salvaty

Paul Benedict Salvaty

Abbe David Lowell

Attorneys for Plaintiff Robert Hunter Biden

**ATTESTATION**

I attest that all the signatories listed above concur in this filing's contents and have authorized the filing of this document.

DATED: January 16, 2024

By: /s/ Nabil L. Abu-Assal

Nabil L. Abu-Assal